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May 19, 2021

**BY ECF**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Elkorany*, 20 Cr. 437 (NRB)

Dear Judge Buchwald:

We represent Mr. Karim Elkorany in the above-captioned proceeding. We write to seek permission to file under seal exhibits to a declaration that is in support of defendant's motion to suppress certain search warrants that were authorized in the above-referenced proceeding. In this case, there is a court-ordered protective order that requires redacting and/or filing under seal documents that the government produces to defense and that defense, in turn, intends to use in court filings that are comprised of sensitive information about the investigation and circumstances surrounding allegations of sexual assault. The government and defense counsel have agreed that while the notice of motion, memorandum in support of the motion and the attorney declaration itself do not need to be redacted or filed under seal, the exhibits used in connection with the declaration merit filing under seal. We provide those documents under separate cover and by email for the Court's review.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/

Dawn M. Cardi  
Chad L. Edgar

Application granted.

**SO ORDERED.**



NAOMI REICE BUCHWALD

UNITED STATES DISTRICT JUDGE

Dated: New York, N.Y.  
May 20, 2021

cc: AUSA Daniel Richenthal  
AUSA Lara Pomerantz  
AUSA Robert Sobelman  
AUSA Amanda Houle (all by ECF)